

TRAUB & TRAUB, P.C.

COUNSELORS AT LAW 39 BROADWAY **SUITE 2420** NEW YORK, N.Y. 10006 (212) 732-0208

TEFFREY TRAUB DORIS G. TRAUB

MEMO ENDORSED

TELECOPTER (212) 571-0860

BY FAX (212)805-6326 Honorable Colleen McMahon United States District Court Judge United States District Court 500 Pearl Street New York, NY 10017-1312

> Re: Roxann R. Haus v. John E. Potter, Postmaster General 07 Civ. 4808 (CM)(JCF)

Dear Judge McMahon:

I am the attorney for the plaintiff in the above-captioned Title VII and Equal Pay Act case. Your Honor was kind enough to grant plaintiff leave to amend her Complaint and to allow for a modest adjustment of the Case Management Plan for such purpose. Since that time, plaintiff has amended her complaint, defendant has served an Answer to the Amended Complaint and the parties have served responses to written discovery requests. Plaintiff's deposition is scheduled to be taken later this week. Although depositions of defendant were originally scheduled for next week, those dates had to be extended to mid-January, so as to allow for defendant's production of additional documents responsive to plaintiff's document requests before the taking of those depositions.

The parties have undertaken discussions regarding the use of expert witnesses in this case and believe that such may not be necessary, but wish to preserve their right to do so, especially since depositions will not be completed until mid-January. For this reason, I am respectfully requesting that the Case Management Plan be amended slightly, so as to require the completion of fact discovery by January 28, 2008 - the current deadline for completion of all discovery - and to allow for the exchange of expert reports, if any, by the end of February. This would allow the parties to maintain the same date as is currently set forth in the Case Management Plan of March 14, 2008 for the filing of a

The Case Management Plan currently requires plaintiff to file her expert report by December 19th and defendant to file its expert report by December 31, 2007.

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joint pretrial order and all other pre-trial submissions. I have conferred with counsel for defendant and the government consents to such a modification.

Thank you for your kind consideration.

Respectfully submitted,

Doris G. Traub, Esq. (DG3114)

cc: John D. Clopper, Assistant U.S. Attorney By Fax (212) 637-0033